

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

JASON ADAM JENSEN, )  
                        )  
                        )  
Plaintiff,           )  
                        )  
                        )  
v.                     )      Case No. 6:22-CV-03140-BCW  
                        )  
                        )  
CITIBANK, N.A., et al., )  
                        )  
                        )  
Defendants.          )

**GOVERNOR MICHAEL PARSON'S JOINDER OF DEFENDANT  
STATE OF MISSOURI'S MOTION TO DISMISS**

COMES NOW, Governor Michael Parson, by and through the undersigned attorney, and hereby states as follows:

1. On or about June 1, 2022, Plaintiff filed his Complaint, Motion to Proceed in Forma Pauperis, and Affidavit of Financial Status. (Doc. 1-1, 1-2, 1-3).
2. The Court ordered Plaintiff to amend his Complaint. (Doc. 3).
3. On or about June 30, 2022, Plaintiff filed his Amended Complaint. (Doc. 5).
4. On or about September 23, 2022, the Court submitted an Order. (Doc. 6). Plaintiff was granted leave to proceed in forma pauperis with respect to Count I against JH Met and Gamache only, Count III against the Citibank defendants, and Count V against the State of Missouri and Stone County only.

*Id.* at 9. All other named parties were dismissed including individuals in their official capacities. *Id.* at 10.

5. Plaintiff has subsequently filed counterclaims and cross-claims without leave of Court and failing to name Governor Parson as any type of defendant. (Doc. 29, 36, 42, 44)

6. On or about December 17, 2022, Plaintiff filed his Motion for Leave to Amend Service of Process on the State of Missouri. (Doc. 41). For that motion, Plaintiff claimed bona fide error in serving the Secretary of State instead of the Governor of Missouri. *Id.* at 1.

7. On or about November 11, 2022, the Missouri Attorney General's Office entered its appearance behalf of the State of Missouri. (Doc. 18).

8. On or about December 5, 2022, the State of Missouri timely filed its Motion to Dismiss and Suggestions in Support. (Doc 31 and 32).

9. Governor Parson is not a proper party to this law suit.

10. Governor Parson alleges the January 11, 2023 service of process was invalid. *See* Doc. 58.

11. If Governor Parson is construed as a party and service is construed as valid, a suit brought against the Governor in his official capacity is essentially a suit against the State of Missouri, which is barred for the reasons set forth in the State of Missouri's Motion to Dismiss. If an Answer or other pleading is construed as necessary by Governor Parson or the State of

Missouri, Governor Parson joins and directs the Court's attention to the State of Missouri's Motion to Dismiss, Document 31.

WHEREFORE, Governor Michael Parson requests, to the extent necessary, joinder to the State of Missouri's timely filed Motion to Dismiss, dismissal of Plaintiff's First Amended Complaint due to his failure to state a claim for a violation of the American's with Disabilities Act, an order from this Court that Governor Parson is not a party to this suit, and for such other and further relief this Court deems just and proper.

Respectfully submitted,

**ANDREW T. BAILEY**  
Attorney General

/s/Anna Connelly  
Assistant Attorney General  
Missouri Bar No. 67428  
615 E. 13<sup>th</sup> Street, Suite 401  
Kansas City, MO 64106  
Telephone: (816) 889-5000  
Fax: (816) 889-5006  
E-Mail: [Anna.Connelly@ago.mo.gov](mailto:Anna.Connelly@ago.mo.gov)  
*Attorney for State of Missouri*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 3rd day of February, 2023, a copy of the foregoing was filed through the Court's PACER system, which sent an electronic copy to all counsel of record, and to *Plaintiff Pro Se* at jasonjensen@gmail.com.

/s/ Anna Connely  
Assistant Attorney General